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12 Attorneys for Plaintiffs/Counterdefendants

13  
14 UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,  
17 ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
18 INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,  
MD, RUSSELL J. SHAH, MD, LTD., DIPTI  
23 R. SHAH, MD, LTD., and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
24 URGENT CARE, DOES 1-100, and ROES  
101-200,

25 Defendants.

26  
27 AND RELATED CLAIMS  
28

CASE NO. 2:15-cv-01786-APG-CWH

STIPULATION TO INCLUDE  
CLAGGETT & SYKES LAW FIRM INTO  
THE STIPULATED CONFIDENTIALITY  
AND PROTECTIVE ORDER (ECF NO.  
39) FOR THE DISCLOSURE OF  
DOCUMENTS PURSUANT TO F.R.C.P.  
45 SUBPOENA

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and  
4 the law firm of CLAGGETT & SYKES (non-party herein after referred to as "C&S") hereby stipulate  
5 and agree as follows:

6 1. Plaintiffs served C&S with a subpoena pursuant to F.R.C.P. 45 for the production of  
7 documents regarding communications and payments made by and between Law Firm and the  
8 Defendants during C&S's representation of certain clients in personal injury claims for which  
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. C&S provided a written objection to the Rule 45 subpoena.

11 3. C&S is aware that Plaintiffs have subpoenaed several law firms seeking the same type  
12 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
13 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

14 4. C&S understands that this Court presides over both the instant matter as well as the  
15 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law  
16 firms to produce the same type of documents request of C&S.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs  
18 and Defendants for the disclosure of confidential, sensitive or other protected information was  
19 approved by this Court on May 20, 2016. (ECF No. 39).

20 6. C&S was not a party to the stipulated confidentiality and protective order. (ECF No.  
21 39).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also  
23 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Belsky*  
25 matter, the parties hereby stipulate and agree that the protections and scope articulated in the  
26 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.  
27 39) be extended in their entirety to cover C&S in its compliance with Plaintiffs' subpoena.

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1 9. C&S will produce all documents responsive to the subpoena within ten (10) days of  
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/14/19

Dated:

5 McCORMICK, BARSTOW, SHEPPARD,  
6 WAYTE & CARRUTH LLP

CLAGGETT & SYKES LAW FIRM

7   
By: \_\_\_\_\_

By:  12753

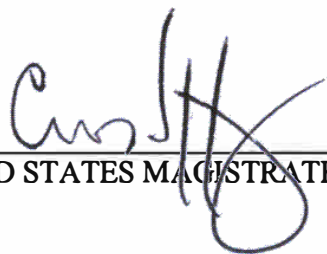
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13 **ORDER**

14 IT IS SO ORDERED.

15 DATED this 14 day of January, 2019.

16  
17   
18 UNITED STATES MAGISTRATE JUDGE  
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